



July 25, 2025

Timothy R. Beyer
Partner
Direct: +1 303 866 0481
tim.beyer@bclplaw.com

BRYAN CAVE LEIGHTON PAISNER LLP
1700 Lincoln Street Suite 4100
Denver CO 80203 4541
T: +1 303 861 7000
F: +1 303 866 0200
bclplaw.com

Hon. Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse, S.D.N.Y.
500 Pearl Street
New York, NY 10007

Via ECF

Re: *Coach IP Holdings, LLC v. ACS Group Acquisition LLC et al.* – Case No. Case 1:23-CV-10612-LGS – Letter Motion to Seal

Dear Judge Figueredo:

Pursuant to Your Honor’s Individual Rule I(g)(2), Coach IP Holdings, LLC, Coach Services, Inc. and Tapestry, Inc. (“Coach”) respectfully request Your Honor’s approval to seal (1) portions of Coach’s Memorandum of Law in Opposition to Vinci Brands LLC’s Motion to Amend Its Counterclaims and to Join Additional Defendants (the “Opposition”) and (2) Exhibits B and C to the July 25, 2025 Declaration of Timothy R. Beyer in Support of the Opposition (the “Beyer Declaration”).

On February 7, 2024, Judge Schofield so-ordered stipulation and confidentiality agreements (“Protective Orders”) in the related matters (1) the “KSNY Action”—*Kate Spade LLC et al. v. Vinci Brands LLC et al.*, No. 1:23-cv-05409-LGS-VF—and (2) the “Vinci Action”—*Vinci Brands LLC v. Kate Spade LLC et al.*, No. 1:23-cv-05138-LGS-VF. Pursuant to the Protective Orders, parties may mark documents produced in discovery as “Confidential” and “Highly Confidential – Attorney’s Eyes Only.”

Case-Mate, Inc. (“Case-Mate”) designated Exhibits B and C to the Beyer Declaration as Confidential. Those designations have not been changed voluntarily or by court order, and therefore remain in place. These documents include Coach confidential information as well as Case-Mate confidential information, and that confidential information is also cited in the Opposition. Additionally, because Case-Mate designated these documents as Confidential, it should have the opportunity to join in this letter motion to seal. Exhibit A to the Beyer Declaration was designated as Confidential by Case-Mate, however, Coach asked Case-Mate to review its confidentiality designation under the Protective Orders and Case-Mate agreed to de-designate it, allowing Coach to file it publicly.

To protect Coach’s confidential information, Coach moves to seal the highlighted portions of the Opposition as well as Exhibits B and C to the Beyer declaration.

The Honorable Valerie F. Figueredo
July 25, 2025
Page 2

We thank the Court for its attention to this matter.

Respectfully Submitted,

Timothy R. Beyer

Timothy R. Beyer

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 7/28/25

The motion to provisionally seal the documents is GRANTED. The Clerk of Court is directed to terminate the motion at ECF No. 219 and maintain the viewing restrictions at ECF No. 221. If Case-Mate wishes to permanently seal the documents, Case-Mate is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **August 25, 2025**.